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July 12, 2021

BY ECF

Hon. Nicholas G. Garaufis
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Raniere, 18 CR 204 (S-2) (NGG) (EDNY)

Dear Judge Garaufis:

I am writing on behalf of defendant Keith Raniere to provide the Court with a proposed Stipulation of Substitution of Counsel executed by all remaining counsel in favor of myself and Marc Fernich. As the defendant is presently incarcerated in Tucson, Arizona, I would respectfully request that Mr. Raniere be excused from signing this document as well.

I appreciate Your Honor's consideration and remain available for a conference should the Court deem it necessary.

Respectfully submitted,



Jeffrey Lichtman

Enc.

cc: All counsel (by ECF)

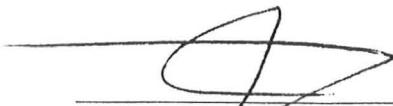
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,	:	
-against-	:	PROPOSED STIPULATION
	:	OF SUBSTITUTION OF
KEITH RANIERE, et al.,	:	<u>COUNSEL</u>
	:	
Defendants.	:	18 CR 204 (NGG)
-----X	:	

IT IS HEREBY STIPULATED, CONSENTED AND AGREED by the undersigned that JEFFREY LICHTMAN, ESQ., JEFFREY EINHORN, ESQ., JASON GOLDMAN, ESQ., Law Offices of Jeffrey Lichtman, 11 E. 44th Street, Ste. 501, New York, New York 10017, and MARC FERNICH, ESQ., Law Office of Marc Fernich, 800 Third Avenue, Floor 18, New York, New York 10022 are substituted as attorneys for defendant KEITH RANIERE in place and instead of JENNIFER BONJEAN, ESQ., Bonjean Law Group, 750 Lexington Avenue, 9th Floor, New York, New York 10022, JOSEPH MCBRIDE, ESQ., The McBride Law Firm, PLLC, 99 Park Avenue, 25th Floor, New York, New York 10016, MARTIN TANKLEFF, ESQ., and STEVEN ALAN METCALF II, ESQ., Metcalf & Metcalf, P.C., 99 Park Avenue, Suite 2501, New York, New York 10016.

Dated: New York, New York
July 7, 2021

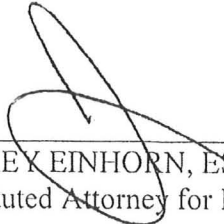
New York, New York
July 7, 2021



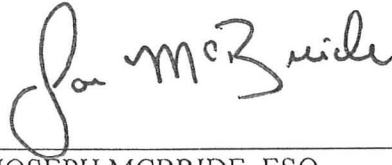
JEFFREY LICHTMAN, ESQ.
Substituted Attorney for Defendant

/s/JENNIFER BONJEAN

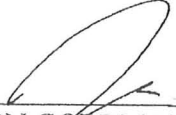
JENNIFER BONJEAN, ESQ.
Former Attorney for Defendant



JEFFREY EINHORN, ESQ.
Substituted Attorney for Defendant



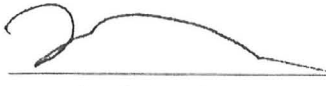
JOSEPH MCBRIDE, ESQ.
Former Attorney for Defendant



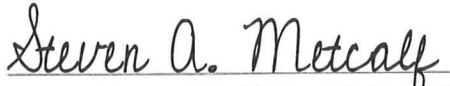
JASON GOLDMAN, ESQ.
Substituted Attorney for Defendant

 July 10, 2021

MARTIN TANKLEFF, ESQ.
Former Attorney for Defendant



MARC FERNICH, ESQ.
Substituted Attorney for Defendant

 July 10, 2021

STEVEN ALAN METCALF II, ESQ.
Former Attorney for Defendant

SO ORDERED:

HON. NICHOLAS G. GARAUFIS, U.S.D.J.